

**IN THE UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF NEW MEXICO**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

No. CR 20-01566-DHU

TIMOTHY CHISCHILLY,

Defendant.

STACEY YELLOWHORSE'S WITNESS AND EXHIBIT LIST

Defendant Stacey Yellowhorse, by and through her attorneys of record, Carey C. Bhalla and Wouter Zwart of Rothstein Donatelli LLP, respectfully files her Witness and Exhibit List.

WITNESS LIST:

CROWN POINT POLICE OFFICERS

Most of the officers listed herein responded to other, previous incidents of violence regarding Timothy Chischilly

1. Frederick Bitsoi (T3026)
2. Billy Chasity (T3009)
3. Calvin Guerro (T3024)
4. Joel Leuppe (T394)
5. Willis Martine (T472)
6. Daniel Kalleco (T360)
7. Franklin Begaye (T390)
8. Richelle Sandoval
9. Christopher Sloan (T3000)
10. Darrell Betonie (T392)
11. Rory Knight (T3027)
12. Christopher R. Tsosie

13. Israel Tsosie (T3001)

NAVAJO NATION EMS

14. Brandon Garnenez

UNM/OMI

15. Dr. Heather Edgar
16. Ross Zumwalt, MD
17. Nicole Jackson, MD

FBI Agents

18. Mark J. Stephenson
19. Alan M. Giusti, DNA Casework Unit
20. Tammy Ann Peter, FBI Photographer of Buick

Expert Witnesses

21. Dr. Chitra Ragavhan

Other Witnesses

Most of the witnesses listed herein are victims and/or witnesses to other, previous acts of violence by Timothy Chischilly

22. Andrew Anderson
23. Letisha Anderson
24. Reycita Billie
25. Melvin Chavez
26. Jennifer Chischilly
27. Jeramiah Chischilly, listed in Crown Point Incident Report # 03-15-009765 (dated 05/05/2015)
28. Maryann Chischilly

29. Meldrith Chischilly
30. Mildred Chischilly
31. Joshua Chischilly
32. Laura Cody
33. Clark Ernest
34. Maxine George
35. Lorinda Henio
36. Amelia James
37. Herman James
38. Marlene James
39. Marshall James
40. Kelvin Manuelito
41. Kyle Manuelito
42. Ramson Plummer
43. Tina Sam
44. Lewistus Silversmith
45. Rhonda Silversmith
46. Julia Smith
47. Fannie Talley
48. Leander Talley
49. Wendall Talley
50. Winston Talley
51. Dionna Cherish Tyndall
52. Tiffany Watson
53. Will Woodie
54. Jennifer Yazzie
55. Latissa Yazzie
56. Metisha Yazzie
57. Jennier Chischilly
58. Terrance Yellowhorse
59. Herman Yellowhorse

60. Brandi Yellowhorse
61. Yellowhorse's Brother Shannon (LNU) (Defendant will supplement when possible)
62. Tinkerbelle (FNU LNU) (Defendant will supplement when possible)

OTHER

63. Defendant Yellowhorse reserves the right to call any witness listed on the Government's witness list.

EXHIBIT LIST

1. FBI 302 regarding photographs of Ms. Yellowhorse at jail (Bates # 0003)
2. FBI 302 regarding Mr. Chischilly Interview (Bates # 0141-0143)
3. FBI 302 regarding recordings of Stacey Yellowhorse (Bates # 0196-0197, 0202)
4. FBI 302 regarding Herman Yellowhorse (Bates # 2066)
5. FBI 302 regarding confidential source (Bates # 2540)
6. FBI 302 regarding receipt of property from Crownpoint Police Department (Bates # 4010)
7. Photographs in evidence of binder containing passwords in white Buick (Bates # 1174, 1181, 1210, 1211, 1266, 1272, 1273, 1276, 1277, 1278 1280, 1284)
8. Photographs in evidence of knife in white Buick (Bates # 1289-1292)
9. Photographs of Ms. Yellowhorse at jail (Bates # 1134-1155)
10. FBI DNA Report (Bates # 2721-2860)
11. FBI Lab Report Latent Prints (Bates # 2279-2284)
12. Transcript of Grand Jury Proceedings (Bates #1681-1732) (February 11, 2020) (CM/ECF Doc. 122-1).
13. Photographs in evidence of scene, landscape, and house (Bates # 0491, 493-508, 533)
14. Recordings and transcripts of Stacey Yellowhorse's recorded statements (Bates # 3463-3523 (field interview); Bates # 3524-2656 (interview 2/1/2020); (second interview 2/1/2020))
15. Dr. Chitra Raghavan's CV
16. Photographs in evidence of nails at burn sight (Bates # 1064-1065, 1068-1070)
17. Forensic Anthropology Report (Bates # 2228-2239)
18. NM EMS Report (Bates # 1168-1171)

19. Recordings and transcripts of Mr. Chischilly's recorded statements (Bates # 3740-3795 (field interview 2/1/2020); Bates # 3796-3880 (interview 2/1/2020))
20. Transcript regarding conversation with confidential source (Bates # 2542-2572)
21. Confidential source map (Bates # 2541)
22. Transcript of Mr. Chischilly change of plea agreement (CM/ECF Doc. 132)
23. Sealed Grand Jury Transcript Patricia and Herman Yellowhorse (CM/ECF Doc. 122-2) (Bates # 2037-2062)
24. Mr. Chischilly's Crown Point Incident Reports (Bates # 1733-1860)
 - Report Number and Date:
 - # 03-11-009688 (dated 05/14/2011)
 - # 03-11-019187 (dated 10/01/2011)
 - # 03-12-022498 (dated 12/02/2012)
 - # 03-13-002202 (dated 02/03/2013)
 - # 03-14-006579 (dated 03/29/2014)
 - # 03-15-009765 (dated 05/05/2015)
 - # 03-15-012968 (dated 06/16/2015)
 - # 03-15-016237 (dated 08/01/2015)

Other

25. Defendant Yellowhorse reserves the right to offer any exhibit offered by the Government.

Respectfully submitted,

ROTHSTEIN DONATELLI LLP

/s/ Wouter Zwart

WOUTER ZWART

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 1st day of June, 2022, I filed the foregoing electronically through the Court's CM/ECF system, which caused counsel to be served by electronic means, as more fully reflected on the Notice of Electronic Filing.

/s/ Carey C. Bhalla
CAREY C. BHALLA